

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Colin David Peters	:	No. 5:19-bk-03928-RNO
aka Colin D. Peters	:	Chapter 13
aka Colin Peters	:	
aka Collin Peters	:	
Debtor	:	

Old Farm Estates Homeowners’ Association,	:	
	:	
Movant	:	Motion for
v.	:	Relief from Stay
Colin David Peters	:	
aka Colin D. Peters	:	
aka Colin Peters	:	
aka Collin Peters	:	
Respondent.	:	

ANSWER TO MOTION OF OLD FARM ESTATES HOMEOWNERS’ ASSOCIATION
FOR RELIEF FROM STAY

AND NOW COMES Debtor, Colin David Peters, by and through his attorneys, Newman, Williams, P.C., and in Answer to the Motion of Old Farm Estates Homeowners’ Association for Relief from Stay aver as follows:

1. Admitted.
2. Admitted.
3. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

4. Admitted in part and denied in part. It is admitted only that such payments have not been made. By way of further response, the Debtor has not received any invoices for the postpetition assessments. Debtor has no idea whether to send payments to and to whom.

By way of further response, Debtor does not see a transaction history attached to the Motion.

WHEREFORE, Debtor, Colin David Peters, respectfully prays this Honorable Court for an Order that the Motion of Old Farm Estates Homeowners' Association for Relief from Stay be denied and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell
Robert J. Kidwell, Esquire
Attorney for Debtor
PO Box 511, 712 Monroe Street
Stroudsburg, PA 18360
(570) 421-9090; fax (570) 424-9739
rkidwell@newmanwilliams.com